

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

JOAN MULLIN, ADMINISTRATRIX OF
THE ESTATE OF ROBERT MULLIN,
deceased and JOAN MULLIN,
individually,

Plaintiffs,

v.

ADMINISTRATOR KAREN BALICKI, in
her personal and individual capacities
representing the State of New Jersey, the
Department of Corrections of the State of
New Jersey, South Woods State Prison, and
Central Reception & Assignment Facility
(C.R.A.F.), DIRECTOR ROBERT
PATTERSON, in his personal and
individual, representing the State of New
Jersey, the Department of Corrections of
the State of New Jersey, South Woods State
Prison, and Central Reception &
Assignment Facility (C.R.A.F.) DIRECTOR
MARIE DUNLAP-PRYCE, in her personal
and individual capacities, representing the
State of New Jersey, the Department of
Corrections of the State of New Jersey,
South Woods State Prison, and Central
Reception & Assignment Facility
(C.R.A.F.), JANE BYRD, L.P.N., in her
personal and individual capacities, ERIN
MARUSKY, R.N., in her personal and
individual capacities, OFFICER
NICHOLAS DIMLER, in his personal and
individual capacities, OFFICER ROBERT
RUSSO, in his personal and individual
capacities, CHIEF RALPH YANSEK, in
his personal and individual capacities, Lt.
DUDICH, in his personal and individual
capacities, SGT. B. STERN, in his personal
and individual capacities, SGT. THOMAS
SPENCE, in his personal and individual
capacities, OFFICER ERIC LARGE, in his
personal and individual capacities,
KINTOCK GROUP, JOHN DOES 4-10 (as
yet unidentified and unknown
governmental, county, or state officials,
supervisors, agents or employees) in their
personal, individual and professional
capacities, ABC ENTITIES 1-10 (as yet
unidentified and unknown governmental
entities

Civ. No. 3:11-cv-00247

COUNSEL'S CERTIFICATION IN
SUPPORT OF NOTICE OF MOTION TO
AMEND THE COMPLAINT

I, Shelley L. Stangler, herby certify as follows:

1. I am an attorney at law of the State of New Jersey and represent Plaintiffs herein. I am fully familiar with the facts and circumstances of this case. This Certification is made in support of Plaintiff's motion to amend the Complaint.

2. Permission to file this motion was granted by the Hon. Mary L. Cooper in her Opinion and Order of July 25, 2014, docket entries nos: 203 and 204. The Order denied Reconsideration of the Order dismissing most of the claims in the Second Amended Complaint, but permitted plaintiff to file a motion to amend by August 22, 2014.

3. Annexed as Exhibit "A" is the March 4, 2014 letter of counsel to both the Magistrate and District Court Judges overseeing this case. The statements in that letter are hereby certified to as true.

4. Annexed as Exhibit "B" is the proposed Third Amended Complaint.

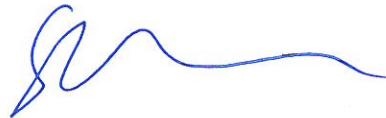
5. Annexed as Exhibit "C" are records Bates numbered CM 0012, 0013 and 0014 from the April 13, 2013 "Missing Disc Discovery" (See Plaintiff's Brief).

6. The new allegations put forward in the Third Amended Complaint are highlighted in bold. After the allegation is a reference to the discovery where the information came from. Data from the April 13, 2013 disc that was lost and misfiled and the subject of counsel's letter to the Court is noted as "Missing Disc Discovery." Data from the July 13, 2013 discovery is noted as "July 2013 discovery." The discovery is then referenced by Bates number. There are also references back to the Second Amended Complaint to indicate that certain claims had been made which are now reworded to allege more facts and the discovery where those facts came from.

7. There are also several exhibits referred to in the Brief. Unless noted as Exhibits "A" or "C" from this certification, the exhibits reference plaintiff's previously filed Motion for Reconsideration under docket entries nos: 185 and 186. The brief references these comments as well.

I hereby certify that the foregoing statements made by me are true. I am aware that if any are willfully false I am subject to punishment.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'S. Stangler', with a long horizontal flourish extending to the right.

SHELLEY L. STANGLER, ESQ

Dated: August 22, 2014